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17 UBER TECHNOLOGIES, INC., RYAN
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

21 HAKAN YUCESOY, ABDI MAHAMMED,
22 MOKHTAR TALHA, BRIAN MORRIS, and
23 PEDRO SANCHEZ, individually and on
behalf of all others similarly situated,
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Plaintiffs,

v.

26 UBER TECHNOLOGIES, INC., RYAN
GRAVES, and TRAVIS KALANICK,
27
28

Defendants.

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MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ, individually and on behalf of
all others similarly situated

CASE NO. 13-00262-EMC

**STIPULATION AND [PROPOSED] ORDER
RE: ONE-DAY BENCH TRIAL**

STIPULATION

Plaintiffs Hakan Yucesoy, Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and Defendants Uber Technologies, Inc., Ryan Graves, and Travis Kalanick (“Defendants”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on May 22, 2015, Defendants filed a motion to compel arbitration, *see* Docket No. 62;

WHEREAS, on June 23, 2015, Plaintiffs filed their opposition to Defendants' motion to compel arbitration, *see* Docket No. 72;

WHEREAS, on July 8, 2015, Defendants filed their reply in support of their motion to compel arbitration, *see* Docket No. 80;

WHEREAS the hearing on Defendants' motion to compel arbitration took place on August 6, 2015;

WHEREAS, the Court ordered the Parties to meet and confer and to submit to the Court by August 13, 2015 a proposed scheduling order for a bench trial on the issue of whether Plaintiff Yucesoy formed a contract with Uber, *see* Docket No. 95;

WHEREAS, the Court has scheduled a further case management conference for November 19, 2015, *see id.*;

WHEREAS the Parties have conferred and agreed to propose November 19, 2015, for the bench trial on the issue of whether Plaintiff Yucesoy formed a contract with Uber, which date would be convenient for the Court and the Parties given that a further case management conference in this matter has already been scheduled for that day;

WHEREAS the Parties have conferred and further agreed that the deposition of Mr. Yucesoy will occur on November 17, 2015, in San Francisco, California, and that the deposition transcript will be in final form by November 19, 2015, for use at trial;

1 NOW THEREFORE, the Parties hereby stipulate to and propose, subject to the approval of
2 this Court, the following:

3 The bench trial on the issue of whether Plaintiff Yucesoy formed a contract with Uber will
4 occur on November 19, 2015, and the deposition of Mr. Yucesoy will occur on November 17, 2015,
5 in San Francisco, California.

6 **IT IS SO STIPULATED**

8 Dated: August 13, 2015

GIBSON, DUNN & CRUTCHER LLP

10 By: _____ /s/ Theane Evangelis
11 Theane Evangelis

12 Attorneys for Defendant UBER TECHNOLOGIES,
13 INC., RYAN GRAVES, and TRAVIS KALANICK

14 Dated: August 13, 2015

LICHTEN & LISS-RIORDAN, P.C.

15 By: _____ /s/ Shannon Liss-Riordan
16 Shannon Liss-Riordan

17 Attorney for Plaintiffs HAKAN YUCESOY, ABDI
18 MAHAMMED, MOKHTAR TALHA, BRIAN
MORRIS, and PEDRO SANCHEZ

20 **[PROPOSED] ORDER**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Bench trial set for
November 23, 2015 at 9:30 a.m.
Further filings, if any,
must be filed by November 9,
2015.

24 Dated: _____, 2015

8/14



ECF ATTESTATION

I, Dhananjay S. Mantripragada, hereby attest that concurrence in the filing of this document has been obtained from Theane Evangelis and Shannon Liss-Riordan.

By: _____ /s/ Dhananjay S. Manthripragada
Dhananjay S. Manthripragada